

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-----------------------------|---|-----------------------------------|
| AS |) | |
| |) | Case No. 24-cv-1851 |
| v. |) | |
| |) | Judge: Hon. Jeffrey I. Cummings |
| THE PARTNERSHIPS and |) | |
| UNINCORPORATED ASSOCIATIONS |) | Magistrate: Hon. David M. Weisman |
| IDENTIFIED ON SCHEDULE "A" |) | |
| _____ |) | |

**PLAINTIFF'S *EX PARTE* MOTION FOR LEAVE TO TEMPORARILY SEAL
DOCUMENTS**

Pursuant to Local Rule 5.8 and Fed. R. Civ. P. 26(c)(1), Plaintiff files this Motion for Leave to Temporarily Seal Documents ("Motion to Seal") requesting leave to file the (1) Memorandum in Support of the Motion for Temporary Restraining Order; (2) Exhibit 1 to the Declaration of Plaintiff; and (3) Exhibit 2 to the Declaration of Plaintiff, which contains screenshot printouts from the infringing websites showing instances of infringement under seal.

In this case, Plaintiff is requesting temporary ex parte relief based on an action for copyright infringement under the Copyright Act. Sealing these limited portions of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence, the hiding or transferring of assets to foreign jurisdictions, and the transfer or disablement of the infringing websites. Such acts would frustrate the purposes of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the

relevant parties and the requested actions are taken, Plaintiff will promptly move to unseal these documents.

Dated this 5th Day of March, 2024.

Respectfully submitted,

By: s/David Gulbransen/
David Gulbransen
Attorney of Record

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